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Via ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Ex parte presentation – Mobility Fund Phase II Bidding Units
WT Docket No. 10-208; WC Docket No. 10-90

Dear Ms. Dortch:

This letter is to provide further information regarding the appropriate bidding unit for use in the Mobility Fund Phase II auction in the above-referenced dockets.

The goal in selecting the bidding unit for the Mobility Fund Phase II auction is to ensure that Americans in rural areas have access to mobile voice and broadband services that are "reasonably comparable" to those available in more densely populated areas – i.e., that mobile services are available where people live, work, and travel.

Commenters in this proceeding have proffered a variety of bidding units, including pops, road miles, geographic area, and agricultural acreage. For the reasons discussed below, using road miles as the bidding unit best serves universal service goals, maximizes coverage of the other types of units, and can be implemented with available data.

Pops alone are not a viable bidding unit for the Mobility Fund.

- Many uncovered road miles are located far from any existing population locations. As a result, use of pops will leave many rural road miles uncovered, denying rural consumers the benefits of the ability to dial 911 in an emergency or use mobile broadband on the road, including for GPS directions.
- Pops will leave large swaths of area uncovered. A handful of census blocks within a census tract tend to have the vast majority of the population. Therefore, using pops will result in a few census blocks being covered while the vast majority of the census blocks within a tract will remain uncovered.
- In addition, densely populated census blocks are smaller in area and sparsely populated census tracts tend to be larger. Therefore, using pops will result in a very small area of the census tract being covered.
- There are no good data on where the pops are actually located within a census block. Thus, pops coverage is presumed based on geographic coverage of the census

blocks in which the pops are known to be located. As a result, using pops would lead to another variant of the "centroid problem" that plagued the FCC's rural wireless coverage data prior to the addition of the shapefile requirement to the Form 477.

Geographic area, as a unit, does not provide sufficient focus on where coverage is needed.

- Looking solely at geographic area takes no account of where people live, work or spend time on recreational activities. This would result in carriers having to serve many areas that are entirely inaccessible, such as remote reaches of National Forests or military installations. In such instances, carriers will be forced to forego the entire census tract, leaving any population centers or road miles in the tract unserved.

Road miles are superior to any of the alternative bidding units.

- Road miles are more reflective of where people live, work, travel, and spend time on recreational activities, especially in rural and sparsely populated areas. Homes, workplaces, and recreational areas generally are served by roads, and most terrestrial travel occurs on roads.
- Road miles capture pops. Population locations (homes, businesses) are almost always located on or near roads.
- Road miles capture relevant geographic area. If an area is located far from any road, it is more likely to be inaccessible to people. Thus, the presence or proximity of roads is a good predictor of the need for coverage in a geographic area. The Commission can calibrate the expansiveness of coverage by including smaller road types. The inclusion of service drives and private roads for service vehicles in addition to standard road types are likely to capture roads in the most remote areas. Coverage on smaller roads will result in coverage of a significant portion of the total geographic area within a census tract.
- Road miles capture agricultural lands. Croplands are generally accessible by roads. Thus, for the same reasons that covering roads leads to covering relevant geographic area, covering roads also tends to bring coverage to agricultural lands. This can be maximized by including agricultural roads in the coverage requirement.
- Higher density census blocks are not only small in area but tend to have more roads. Therefore, carriers are likely to be motivated to serve road miles in such areas. As a result the carriers are going to serve a high % of the pops;
- Lower density census blocks are not only likely to be large in area but have fewer roads. If the FCC sets the minimum road miles that must be covered high enough, carriers will have to cover roads in low density areas to meet that threshold and in turn cover a significant area within the entire tract.
- Thorough and complete data about the location of all types of roads is available in electronic format from neutral commercial and governmental sources. By contrast, there is no good data available about the locations of croplands (other than the roads surrounding them), and only limited data about accessible total geographic areas.

Moreover, use of road miles is most consistent with the purpose of a Mobility Fund, which is to ensure that rural residents have service when they are mobile. Pops, by contrast, would only ensure service at home. When people are mobile they are, by definition, usually on roads. The Commission's own data show that there are over 500,000 miles of roads in this country that lack 4G LTE coverage. On these roads, students are unable to access the Internet on long school bus rides, and their parents are unable to access GPS directions. The farmers and ranchers in agricultural lands served by these roads are unable to deploy modern connected farming technology. If there is no coverage at all, no one even can dial 911.

In light of the foregoing, ATN strongly recommends that the Commission adopt road miles as the bidding and coverage unit for the Mobility Fund Phase II. This can be maximized by setting the minimum coverage requirement to 85% or above. This is the most practical way for the FCC to achieve its goal of getting coverage for the most pops, road miles, and area simultaneously.

Sincerely,

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Vice President
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